

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Laydon v. Mizuho Bank, Ltd., et al.

No. 12-cv-3419 (GBD)

Sonterra Capital Master Fund Ltd., et al. v. UBS AG, et al.

No. 15-cv-5844 (GBD)

**DECLARATION OF BENJAMIN M. JACCARINO IN SUPPORT OF
CLASS COUNSEL'S PETITION FOR AN AWARD OF ATTORNEYS' FEES,
REIMBURSEMENT OF EXPENSES AND AN INCENTIVE AWARD**

I, Benjamin M. Jaccarino, pursuant to 28 U.S.C. §1746, hereby declare as follows:

1. I am a Partner with the law firm of Lovell Stewart Halebian Jacobson LLP (“Lovell Stewart”). The statements herein are true to the best of my personal knowledge, information and belief based on the books and records of Lovell Stewart and information received from its attorneys and staff.

2. Lovell Stewart serves as additional Plaintiffs’ counsel for the putative class in this action.

3. I respectfully submit this declaration in support of Class Counsel’s Petition for an Award of Attorneys’ Fees, Reimbursement of Expenses and an Incentive Award, and seek attorneys’ fees and reimbursement for expenses my firm incurred in this action.

4. During the course of this litigation, and as detailed herein, Lovell Stewart worked on assignments that it was specifically directed to perform by Lead Counsel Lowey Dannenberg Cohen & Hart, P.C.

5. Set forth below are Lovell Stewart’s legal services rendered in this litigation, the lodestar value of those services and the expenses reasonably incurred by the firm in connection with this litigation for which reimbursement is requested.

6. Among the services Lovell Stewart performed on behalf of the putative class in connection with the prosecution of the litigation include, but is not limited to, the following:

- Strategized and planned with Lead Counsel regarding the case.
- Helped Lead Counsel draft and prepare the amended complaint
- Drafted memos and participated in strategy calls with the clients regarding multiple issues, including litigation strategy and specific settlements.
- Communicated with clients regarding the status of the action, progress in the action, and numerous potential strategies and courses of action.
- Reviewed and analyzed transcripts from related actions.
- Reviewed and analyzed documents produced in this action.
- Reviewed and translated Japanese language documents.
- Prepared data, formatted data, and reviewed and analyzed data for further use.
- Worked on the antitrust and CEA portions and the summary of allegation portions of the opposition to the motion to dismiss.
- Researched, prepared for, and argued the antitrust and RICO portions of the second motion to dismiss.
- Prepared for and participated in settlement meetings, conferences, communications, presentations, and mediation.
- Communicated with the economist, Dr. Craig Pirrong, regarding numerous matters.
- Conducted extensive work on potential plan of allocation.
- Conducted legal research regarding jurisdiction, 1292(b), and other matters for briefing.
- Drafted portions of legal briefs.

- Retained Arthur Miller and worked with Lead Counsel and Arthur Miller on personal jurisdiction issues.
- Retained nationally recognized mediator, Ken Feinberg. Worked with Mr. Feinberg and Lead Counsel on plan of allocation issues.

7. The schedule in ¶ 8 below is a summary reflecting the amount of time spent by the attorneys and professional support staff of Lovell Stewart involved in this litigation, and the lodestar calculations based on the firm's current hourly billing rates. The schedule was prepared based upon daily time records maintained by attorneys and professional support staff at Lovell Stewart. The schedule in ¶ 11 below reflects the expenses incurred by the firm in its representation of the putative class in this litigation thus far.

8. From the inception of this litigation through August 31, 2016, Lovell Stewart's total fee compensable time for which it seeks an award of attorneys' fees is summarized below.

Attorneys	Rates	Hours	Charges
Christopher Lovell	\$990	523.95	\$518,710.50
Gary Jacobson	\$940	15	\$14,100.00
Victor Stewart	\$935	157.94	\$147,673.90
Jody Krisiloff	\$830	101.4	\$84,162.00
Ian Stoll	\$780	85	\$66,300.00
Craig Essenmacher	\$755	44	33,220.00
Merrick Rayle	\$730	98.50	\$71,905.00
Jason Eyster	\$710	504.75	358,372.50
Keith Essenmacher	\$705	97	68,385.00
Robert Rodriguez	\$645	166.70	107,521.50
Rikiya Sakamoto	\$475	411.25	\$195,343.75
Benjamin Jaccarino	\$460	90	\$41,400.00
Amanda Miller	\$460	2.10	\$966.00
Fred Isquith	\$460	269.90	124,154.00
Michael Gallagher	\$380	161	\$61,180.00
Matthew Kuipers	\$375	317.60	\$119,100.00
Lisa Claire	\$350	183.60	\$64,260.00
Christopher Mooney	\$330	20.10	\$6,633.00
James Payne	\$275	314.60	\$86,515.00
Paralegals and Legal Assistants			
John Hudak	\$225	18.60	\$4,185.00
Keith Andrews	\$195	36.30	\$7,078.50
Bonnie Lockwood	\$185	11.10	\$2,053.50
Lotan Korenblit	\$175	7.25	\$1,268.75
TOTALS		3,637.64	\$2,184,487.90

9. Thus, the total time for which my firm is requesting an award of legal fees is 3,637.64 hours. The total lodestar value of these professional services is \$ 2,184,487.90.

10. The above hourly rates for Lovell Stewart's attorneys and professional support staff are the firm's current hourly rates. The firm's lodestar figures do not include charges for expense items. Expense items are billed separately and such charges are not duplicated in the firm's current billing rates.

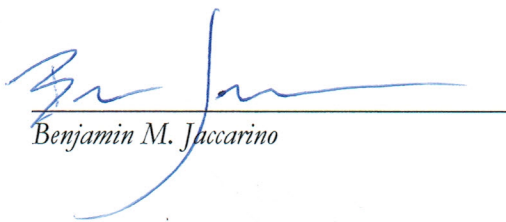
11. As detailed and categorized in the below schedule, Lovell Stewart has incurred a total of \$100,674.29 in expenses for which it is currently requesting reimbursement.

Expense Categories	Cumulative Expenses
Legal Research	\$15,666.51
Travel	\$837.20
Shipping	\$28.55
Expert/Mediation	\$84,124.00
TOTAL	\$100,674.29

12. The above schedule was prepared based upon expense records reflected in the books and records of Lovell Stewart. These books and records are prepared from expense vouchers, check records, receipts and other source materials.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 26th, 2016


Benjamin M. Jaccarino